

UNITED STATES  
DEPARTMENT OF COMMERCE  
BUREAU OF ECONOMIC ANALYSIS  
WASHINGTON, D. C. 20540  
OFFICE OF THE ASSISTANT SECRETARY  
FOR ECONOMIC AFFAIRS  
WASHINGTON, D. C. 20540  
TELEPHONE 202-481-2000  
FACSIMILE 202-481-2000  
MAIL ROOM 202-481-2000  
RECORDS MANAGEMENT 202-481-2000  
GENERAL INVESTIGATIVE DIVISION  
WASHINGTON, D. C. 20540  
TELEPHONE 202-481-2000  
FACSIMILE 202-481-2000  
MAIL ROOM 202-481-2000  
RECORDS MANAGEMENT 202-481-2000

)
)
)
)
)
)
)
)
)
)
)

)

) )

) )

)

)

RS  
T

Tr

g

For purposes of these interrogatories, any reference to "CFWF" is deemed a reference to the United States Council for World Freedom, plaintiff herein. And, any reference to the "contras" shall be deemed a reference to the Nicaraguan Democratic Resistance, also known as the freedom fighters, or anti-communist insurgents seeking to overthrow the Sandinista Government of Nicaragua. Any request for the identity of a person or entity shall be deemed a request for the full name, last known address, most recent date on which the last known address was known to be accurate, and home and work telephone numbers of such person or entity.

INTERROGATORY NO. 1: Identify each officer of CFWF from January 1, 1985 to the present date, including for each, the office or offices held, the dates each office was held, and a description of the duties of each officeholder.

INTERROGATORY NO. 2: For each officer of CFWF listed in response to Interrogatory number 1, state separately the salary, wages or other form of compensation received from CFWF for each year from January 1, 1985 to the present date. Describe separately and with particularity any non-monetary forms of compensation.

INTERROGATORY NO. 3: State the location of any office occupied by CFWF from January 1, 1985 to the present date. If the location of any such office was in the home of an officer or employee of CFWF please so state.

INTERROGATORY NO. 4: Identify all contributions by CFWF made to, for the assistance of, or that pertain to, the contras, from January 1, 1985 to the present date and, for each, set forth the amount(s) (or if applicable, describe the item(s), and its value), and the date contributed. Identify the ultimate recipient of each such contribution.

INTERROGATORY NO. 5:      Identify the person or persons who have personal knowledge of any contributions or assistance received from CFWF on behalf of the contras.

INTERROGATORY NO. 6:      Identify the person or persons who can verify the ultimate recipients of any contribution or aid from CFWF to the contras.

INTERROGATORY NO. 7:      Identify each and every person or persons who can verify how the charitable contributions or aid from CFWF to the contras was used.



INTERROGATORY NO. 8: For each year beginning January 1, 1985 through the present date, state separately the total gross receipts, in cash or kind, received by CFWF.

INTERROGATORY NO. 9: For each year beginning January 1, 1985 through the present date, state separately the amount of expenses CFWF incurred for charitable purposes.

INTERROGATORY NO. 10: Provide a detailed description of the creed or doctrine of CFWF. If there have been any changes or modifications, state all prior versions.

INTERROGATORY NO. 11: Identify each and every person employed by CFWF since January 1, 1985, through the present date, including the dates of employment, the position held, a description of the duties of the employee, and their annual compensation or other remuneration.

INTERROGATORY NO. 12: Identify the person or persons who prepared CFWF's financial statements for the years beginning January 1, 1985 through the present date.

INTERROGATORY NO. 13:      Identify the person or persons who performed bookkeeping services for CFWF during the years beginning January 1, 1985 through the present date.

INTERROGATORY NO. 14: Identify the recipients of all charitable expenditures made by CFWF for each year beginning January 1, 1985 through the present date including, for each recipient, the amount received in each year and the date such expenditure was made.

INTERROGATORY NO. 15: List all publications in which CFWF has solicited funds or published promotional materials during the years beginning January 1, 1985 through the present date.



INTERROGATORY NO. 16: Identify each and every person or persons who solicited funds on behalf of CFWF and state whether each is an officer, director or employee of CFWF.

INTERROGATORY NO. 17: List, individually, all travel of John K. Singlaub on behalf of CFWF from January 1, 1985 to the present date. For each trip state:

- (a) the destination;
- (b) the dates of travel, both to and from, and
- (c) the purpose of the travel.

INTERROGATORY NO. 18: List, individually, all travel of Bill Kenney on behalf of CFWF from January 1, 1985 to the present date. For each trip state:

- (a) the destination;
- (b) the dates of travel, both to and from, and
- (c) the purpose of the travel.

INTERROGATORY NO. 19: Describe the criteria employed by CFWF in determining who were to be the recipients of aid from January 1, 1985 through the present date, and state who made each determination as to the aid given.

INTERROGATORY NO. 20: List, separately, each seminar in which an officer or employee of CFWF was a speaker, from January 1, 1985 through the present date, and for each state:

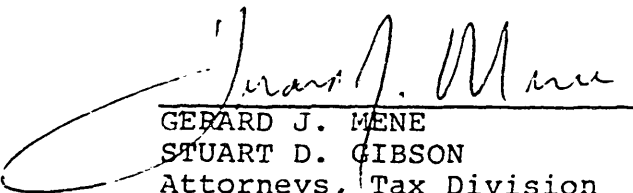
- (a) the identity of the speaker;
- (b) the topic or subject of the speaker and
- (c) the place of the seminar;
- (d) the date of the seminar.

INTERROGATORY NO. 21: List, separately, each seminar hosted by CFWF, from January 1, 1985 through the present date, and for each state:

- (a) identify the speakers;
- (b) the topic or subject of the seminar and
- (c) the place of the seminar;
- (d) the date of the seminar.

INTERROGATORY NO. 22:      Identify every person who may possess information that is relevant or may lead to relevant information regarding this matter.

INTERROGATORY NO. 23: Identify the person or persons who assisted in preparing the answers to these interrogatories and identify the particular interrogatory with respect to which each rendered assistance.



GERARD J. MENE  
STUART D. GIBSON  
Attorneys, Tax Division  
U.S. Department of Justice  
P.O. Box 227  
Benjamin Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 724-7881  
Telephone: (202) 724-6586

OF COUNSEL:

JAY B. STEPHENS  
United States Attorney

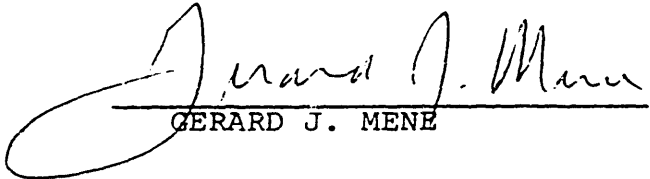


CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that a copy of the foregoing  
DEFENDANT'S FIRST SET OF INTERROGATORIES TO THE PLAINTIFF was  
mailed by United States mail, postage prepaid, this 21 day of  
June, 1988, addressed to:

THOMAS R. SPENCER, JR., ESQUIRE  
Spencer, Bernstein, Seemann and Klein, P.C.  
801 Brickell Avenue, Suite 1901  
Miami, Florida 33131

ROBERT P. KELLY, ESQUIRE  
Office of John P. Sears  
818 Connecticut Avenue, N.W.  
Washington, D.C. 20006

  
GERARD J. MENE